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Stephen E. Calopedis
U.S. Department of Energy
Energy Information Administration, EI-81
1000 Independence Avenue, SW.
Washington, DC 20585.

Dear Mr. Calopedis,

**Comments of BP America concerning
EIA Revised Forms for Voluntary Reporting of GHG Emissions
(71 FR 42637, July 27, 2006)**

BP America is pleased to offer the following comments on EIA's proposed revisions to Form EIA-1605 for the collection of voluntarily reported data on greenhouse gas (GHG) emissions. BP America is the organizational arm of BP plc that owns and operates the US assets formerly owned by our predecessor companies BP, Amoco, Arco, Vastar, and Burmah Castrol. While BP plc is based in London, 45% of our assets and employees are in the United States, and we are the US's largest producer of oil and gas.

BP America participated in the development of and fully supports the comments furnished to you by the American Petroleum Institute (API). The API comments are concerned principally with the conformance of the EIA proposed forms with the revised General and Technical Guidelines for Voluntary Greenhouse Gas Reporting (DOE 1605b) and with the language, intent, and history of the Energy Policy Act's Greenhouse Gas voluntary reporting sections and the President Bush's directive to reform the program on 14 February 2002. We urge you to consider them carefully during your deliberations.

In addition, BP America offers the following comments focusing on the burden of reporting and the report submittal schedule:

- 1) The amount of information requested on the forms is very extensive, particularly for a voluntary reporting program. This complexity is overly burdensome and may discourage the participation of current and new reporters.**

The sheer size of the reporting form (110 pages) is overwhelming and excessive. The Instructions Manual is excessively long and, when coupled with the voluminous Guidelines themselves, they represent a barrier to voluntary reporting by companies currently reporting into the program, and surely any companies just being the task of quantifying their GHG emissions. It is also unclear whether EIA (or anyone else) will have the resources needed for a meaningful review, analysis, and summary of all the information.

EIA could reduce this book keeping burden by making allowances for 3rd party certification of data or Inventory Management Systems, as well as a requirement for data to be stored and available by the reporting entity.

The emission quality rating system as currently constructed creates an additional layer of information that needs to be developed and tracked by the reporting entity. It might not be an issue with very small reporting entities, but for large reporters with a wide variety source types that rely on the application of many emission factors the idea (and potential benefit) of calculating and tracking this rating system is not feasible. Reporters should have the flexibility of either using the DOE rating system or a 3rd party audit to document the quality of their emission estimation approach and to certify that they have met the requirements of the 1605(b) program.

In the request for comment, EIA stated that the “public reporting burden for this collection (the completed reporting form) is estimated to range from 32 hours to 64 hours per response”. This time estimate is far smaller than the BP experience under the old 1605b reporting and does not even begin to represent the complexity proposed under the new reporting guidelines.

It is important to note that the real effort in completing the new forms will be in compiling the source-level emissions data, aggregating it at the facility level and merging it into an entity report. It is the level of effort that is required to collect and manage all the required data components and maintain the data system that is the actual burden. This data management burden (and associated cost) is reoccurring year on year. It is not a one time occurrence.

Finally, there would be significant startup cost associated with the new program, particularly for large entities with numerous sources and multiple source types. These large entities usually have existing data management systems that would require modification to track and manage data only relevant to EIA (i.e. the rating system). These modifications would have significant cost depending on the size and complexity of both the entity and the data management system.

2) The timeline established for submission of the annual emission inventory reports and their subsequent certification may not be manageable. It does not allow a sufficient time for conducting 3rd party reviews and obtaining the needed certification statement upon completion.

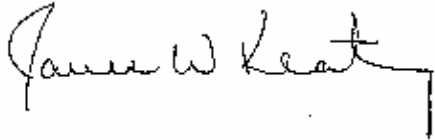
There are two main reasons why the proposed timeline is insufficient and does not reflect what is happening in practice. First, the new methods of data collection and reporting will be much more burdensome, require more effort, and make it more difficult to meet the July 1st reporting schedule. Second, if companies would want to use 3rd party audits to verify their data quality and/or attain a certification statement for emission reduction credits, the additional time allowed (September 1st) is insufficient even for a modest size company. EIA should allow a full six-month or until the end of the calendar year for reporting by those companies that wish to subject their data to 3rd party review.

The initial data reporting in 2007 presents some unique complications. EIA may not be able to finalize the reporting forms and other tools until well into 2007. This would compress the reporting window and make the July and September reporting targets even harder to meet. In addition, many entities may not be collecting the correct data now required under the new 1605b reporting program. This is because the General and Technical Guidelines were not finalized until April 17th and the reporting forms may not be finalized until the end of the year. Recovering or creating data not originally included in the data management system may be difficult, costly, and time consuming. Deadline reporting extensions for 2006 data need to acknowledge these program startup complications.

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BP America appreciates the opportunity to provide these comments to EIA. Should you have any questions or require any clarification of our comments, please feel free to contact me by phone at 630-961-7624 or by email at keatinjw@bp.com.

Very truly yours,

A handwritten signature in black ink, reading "James W. Keating". The signature is written in a cursive style with a long horizontal line extending from the end.

James W. Keating
Environmental Policy Advisor
Communications and External Affairs